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Draft MM EIS Will Consider Three Alternatives

Public Comment Period Slated for Spring 2003

The Defense National Stockpile Center (DNSC) expects to issue a Draft MM EIS that analyzes three mercury management alternatives. The current schedule calls for release of the Draft EIS and a 90-day public comment period next spring.

DNSC Deputy Administrator Cornel Holder says the alternatives now being analyzed in the EIS represent the best of the proposed options. "Since DNSC initiated the MM EIS last year, we have developed several reasonable alternatives for long-term mercury management. We've taken a closer look at some that initially seemed like good possibilities, and we've made some adjustments. We have more reliable information now, and that means better alternatives in the EIS and a better decision at the end of the process."

The three mercury management alternatives being analyzed in the MM EIS are:

- no action, i.e., maintaining current mercury storage at existing sites,
- resumption of mercury sales with restrictions, and
- consolidation of mercury for storage at one location.

"Currently, no final decisions have been made," Holder emphasizes. "We want to review the findings in the draft and get input from our Interagency Working Group and the public before deciding on a course of action."

"Ultimately," Holder says, "we will evaluate the potential environmental and human health impacts of all the alternatives, along with cost, schedule, and policy considerations. And we will choose one that is protective of the public health, environmentally sound, and cost-effective."

'No Action' Means Mercury Would Stay Where It Is

Under the 'no action' alternative, which is required by law in all EISs, DNSC would continue to store the mercury currently at its depots in Somerville, New Jersey; New Haven, Indiana; and Warren, Ohio; and at the Department of Energy Y-12 National Security Complex in Oak Ridge, Tennessee.

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DNSC Upgrades Mercury Safety and Security

DNSC has enhanced the safety and security of mercury stored at DNSC depots in Somerville, New Jersey; Warren, Ohio; and New Haven, Indiana through a process referred to as 'over-packing'.

Several layers of protection are provided inside the drums, which are lined with an epoxy-phenolic coating. The bottom of each drum is covered by a cushioning material that doubles as an absorbent mat. The flasks are separated by a cardboard divider for additional cushioning and sealed in a thick plastic bag. Finally, each drum lid is equipped with a half-inch rubber gasket and a steel-locking ring that is bolted to seal the drum making them airtight and liquid-tight.

Monitoring Shows No Significant Increase In Mercury Vapor Levels

In August 2000, the New York State University (SUNY) and New Jersey Institute of Technology (NJIT) began an intensive independent study of mercury vapor readings before and during the over-packing procedure. Using state-of-the-Art Ohio LUMEX™ and Tekran™ mercury vapor analyzers, in addition to meteorological equipment, they measured mercury vapor concentrations in the surrounding community to establish upwind and downwind concentrations at key off-site locations.

Data from SUNY and NJIT vapor monitoring inside, outside and downwind of all mercury stockpile depots show mercury vapor levels to be within established background readings and confirmed that no significant amount of mercury vapor was contributed to the ambient air at the DNSC depots. ■

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Sales Would Be Restricted

The sales alternative would involve the resumption of mercury sales at a rate that is unlikely to disrupt the world mercury market. DNSC voluntarily halted sales in 1994 because of concerns about the global environment. Under the sales alternative in the EIS, DNSC mercury would be sold from the mercury storage location (s), and buyers would be responsible for the transport of purchased mercury. If this alternative is eventually chosen, the Market Impact Committee, composed of representatives of the Departments of Agriculture, Commerce, Defense, Energy, Interior, State, Treasury, and the Federal Emergency Management Agency, would determine the actual amount of mercury that would be sold each year and publish this information in the *Federal Register* for public comment.

The mercury could be sold to producers such as mercury mining and refining companies as well as those that recover and reclaim mercury. It could also be sold to chemical processing companies such as those in the chloralkali industry, and manufacturers that use mercury in products such as lighting and light switches, medical equipment, and dental amalgam. Or, the entire inventory could be sold to one or more overseas mining companies with the understanding that mining would be reduced to compensate for the release of the stockpiled mercury. Mercury is mined primarily in Spain, Algeria, Kyrgyzstan, Ukraine, and China.

Long-term, Consolidated Storage Would Be at One Site

According to DNSC's Director of Environmental Policy Management, Kevin Reilly, "The mercury should be easier to manage if it were consolidated in one place, and it would be more cost-effective than storing portions at multiple sites around the country. However, that's a decision that will be made after we study and evaluate the proposed alternatives."

DNSC has spent the past year identifying and screening sites that would be willing to host a mercury storage facility that could be analyzed in the MM EIS. Because it took longer than anticipated to identify potential sites, the EIS schedule has been somewhat delayed, but, in the long run, DNSC officials say, the result will be a better EIS.

The process for identifying potentially acceptable sites consisted of asking other federal agencies if they could propose any sites; developing criteria for screening them; and visiting proposed sites to gather information to apply to the screening process.

As a result of the screening process, three sites were selected for full evaluation in the EIS (along with three DNSC depots where mercury is currently stored):

- Pez Lake Development, Romulus, New York
- Utah Industrial Depot, Tooele, Utah
- Hawthorne Army Depot, Hawthorne, Nevada

When considered in conjunction with DNSC's existing mercury storage depots, these three new sites provide a wide variety of environmental conditions, and, located as they are in different parts of the United States, allow for analysis of a range of transportation distances.

Holder says that the important thing to remember about DNSC mercury storage is this: "We've been responsible stewards of the stockpile. We've stored mercury safely for 50 years; we know how it should be done; and we are committed to seeing that it's done right."

Transporting mercury to consolidate it at one site would be 'business as usual' in Reilly's view: "DNSC would follow the Department of Transportation's requirements when transporting mercury."

Treatment Alternatives Will Not Be Included in the EIS

A number of alternatives were considered but will not be evaluated in detail in the MM EIS because of technical immaturity, prohibitive cost, regulatory unacceptability, or because they do not support the purpose and need for the proposed action.

During the scoping process for the MM EIS, DNSC considered evaluating a treatment and storage alternative that would have involved processing the mercury to a stabilized form and then storing the processed material in anticipation of future beneficial uses. This alternative was eliminated during formulation of the final alternatives for three reasons: (1) mercury can be safely stored in its elemental form, and, (2) elemental mercury is the preferred form in most industrial uses that require mercury, and (3) technology has not yet been developed for treatment of mercury. Processing may preclude some future uses of mercury or at least make them more difficult and more expensive. Thus, a treatment and storage alternative would result in additional environmental impacts and costs, without significant benefits, during initial processing (stabilization), storage, and conversion (reclamation) back into elemental mercury at the end of the storage period.

Initially, DNSC also considered a treatment and disposal alternative that would have involved managing the mercury at facilities permitted to handle hazardous waste. However, research determined that potential treatment technologies are not yet commercially available at the scale required. ■

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>
> **Cornel Holder**
> **DNSC DEPUTY ADMINISTRATOR**

Newly Identified, Potential Consolidated Mercury Storage Sites

Based on written requests from site sponsors and DNSC's preliminary site evaluation, the following potential consolidated mercury storage sites—as well as DNSC's current mercury storage depots—will be analyzed in the MM EIS for significant environmental impacts. The MM EIS will not be the sole means of determining the location of future mercury storage, if that is the alternative that DNSC selects as the result of the EIS. That determination would be based on the results of the EIS as well as a separate procurement process. We asked the spokesmen for the potential sites why they had proposed their facilities to DNSC for analysis in the MM EIS:

HAWTHORNE ARMY DEPOT

Hawthorne, Nevada is an active Army base.

LTC David Dornblaser, Commander, Hawthorne Army Depot:

"I believe the long-term storage of DNSC mercury at the Hawthorne Army Depot is compatible with our core competencies and makes excellent use of storage capacity not currently projected to be used for our ammunition storage function. I believe the community will embrace this new mission as a balance to a fluctuating workload in our ammunition operations."

UTAH INDUSTRIAL DEPOT

Tooele, Utah is a privately-owned site on land previously owned by the adjacent Army base.

Mark Smith, Asset Manager, Utah Industrial Depot:

"We have 1.5 million square feet of space available. DNSC's long-term, consolidated mercury storage proposal would fit well with the existing configuration of buildings and our mode of operation. We are zoned a 'heavy industrial business park'; and mercury storage would fit into our future plan. We are adjacent to an active military base so the security is addressed. For us, this is a hand-in-glove operation."

PEZ LAKE DEVELOPMENT

Romulus, New York would be privately-owned by the Advantage Group at the time mercury consolidation would theoretically take place. At present, the Advantage Group operates it under a lease agreement with the development corporation that is in the process of purchasing the former Seneca Army Depot.

Neal Sherman, President, The Advantage Group:

"We have the appropriate zoning and space available at this former Army depot, and we have the capability to fill DNSC's requirements for long-term mercury storage." ■

Frequently Asked Questions

■ ***How were potential, consolidated storage sites selected for analysis in the MM EIS?***

DNSC conducted an extensive search for potential mercury storage sites beginning with a Federal Register notice request to all federal agencies, letters to specific agencies, and meetings with Department of Defense organizations. DNSC developed screening criteria and visited potential sites to assess their suitability before selecting three for full evaluation in the EIS along with three DNSC depots where mercury is currently stored.

■ ***Does evaluation in the MM EIS mean that storage would occur at one of the locations analyzed?***

If the Consolidated Storage Alternative were selected in the Record of Decision for the MM EIS, DNSC would conduct a competitive procurement to select a specific mercury storage site/vendor. Therefore, additional sites might be considered at that time.

■ ***Why couldn't DNSC just keep the mercury at one of its existing storage depots?***

Existing DNSC mercury storage depots will be analyzed in the EIS for continued storage of current amounts of mercury and for impacts from consolidated mercury storage.

■ ***Would a consolidated storage site for DNSC mercury eventually become the repository for all of the nation's mercury?***

DNSC is conducting the MM EIS exclusively to find a long-term solution for DNSC's elemental mercury stockpile. In fact, as a small organization within DoD, DNSC does not have the responsibility or the authority to address disposition of mercury from any other source.

■ ***What would DNSC do to ensure the safety of mercury shipments from current storage locations to a consolidated storage site?***

DNSC routinely transports commodities safely and securely. All truck shipments must comply with Department of Transportation regulatory requirements. Specific routing of mercury shipments would follow a systematic process in accordance with DoT regulations. Shipments must also comply with Defense Department regulations covering physical security and notification.

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■ ***Why isn't DNSC analyzing a treatment and storage alternative in the MM EIS?***

Initially, DNSC considered evaluating a Treat and Store Alternative that would have involved processing the mercury to a stabilized form before storing it. It was eliminated for three reasons: First, mercury can be safely stored in its elemental form; all DNSC mercury is in that form and has been safely stored for more than 50 years. Second, if beneficial, industrial uses for mercury were identified in the future, the elemental form would be the desired starting point. Finally, treatment technologies now in development are not ready for full-scale application.

■ ***What is DNSC doing to protect the public from a possible terrorist attack on one of its mercury storage depots?***

The possibility of terrorist acts against the United States is on everyone's mind these days. At DNSC, our top priority has always been the safety of our communities, our employees, and the environment, and we have taken additional steps to safeguard our mercury storage depots since September 11. In addition to armed security, perimeter fencing, and closely controlled access at our depots, we are working closely with local authorities to ensure that even the most unlikely scenarios could be handled properly. ■

MM EIS SCHEDULE UPDATE

- DNSC expects to issue the Draft EIS by spring 2003.
- A 90-day public comment period will follow release of the Draft EIS, and public meetings will be held during this time in communities near sites analyzed in the EIS.
- The Final EIS is expected in late 2003.
- A Record of Decision will be published no earlier than 30 days after the Notice of Availability of the Final EIS is published in the *Federal Register*.

TO OBTAIN MORE INFORMATION:

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The MM EIS Draft will be available on the MM EIS website at www.mercuryeis.com and at the following information repositories:

- **Allen County Public Library**
  435 Ann Street
  New Haven, IN 46774-1279
- **Bridgewater Branch Library**
  N. Bridge Street and Vogt Drive
  Bridgewater, NJ 08807
- **Seneca Army Depot**
  5786 State Route 96
  Bldg. 123
  Romulus, NY 14541
- **Fairfax County Public Library**
  12000 Government Center Parkway
  Ste. 324
  Fairfax, VA 22035
- **Hillsborough Public Library**
  379 South Branch Road
  Hillsborough, NJ 08844
- **Martin Luther King, Jr. Library**
  Paul Mills, Chief Sociology
  Education and Government Div.
  901 G. Street, NW
  Washington, DC 20001
- **Mineral County Public Library**
  P.O. Box 1390
  Hawthorne, NV 89415
- **Oak Ridge Public Library**
  1401 Oak Ridge Turnpike
  Oak Ridge, TN 37830
- **Raritan Valley Community College**
  Evelyn S. Field Library, North Branch
  Route 28 and Lamington Road
  Somerville, NJ 08876
- **Somerville Public Library**
  35 West End Avenue
  Somerville, NJ 08876
- **Tooele City Public Library**
  128 West Vine Street
  Tooele, UT 84074
- **Warren-Trumbull County Public Library**
  444 Mahoning Avenue NW
  Warren, OH 44483
- **West End Branch Library**
  1101 24th and L Street, NW
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